

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF THE
KINGDOM OF DENMARK (SKAT) TAX REFUND
SCHEME LITIGATION

SKATTEFORVALTNINGEN,

Plaintiff,

v.

RAUBRITTER LLC PENSION PLAN, ALEXANDER
BURNS, RICHARD MARKOWITZ, AND JOHN VAN
MERKENSTEIJN,

Defendants.

Consolidated Multidistrict Action

Docket No. 1:18-md-02865-LAK

This document relates to:
1:18-cv-04833-LAK

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO ANSWER THE AMENDED COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, that the current July 14, 2021 deadline for defendant Alexander Burns to answer the Amended Complaint in this action is hereby extended sixty (60) days up to and including September 13, 2021.

This is the defendant Burns's second request for an extension of time to answer.

No provision of this Stipulation and Order shall be construed as a waiver of, and Mr. Burns expressly reserves, any and all defenses.

Dated: New York, New York
July 14, 2021

SHER TREMONTE LLP

By: /s/ Michael Tremonte
Michael Tremonte

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By: /s/ John McGoey
(e-signed with consent)
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*Counsel for Skatteforvaltningen (Customs and
Tax Administration of the Kingdom of
Denmark)*

SO ORDERED:

Lewis A. Kaplan
United States District Judge

SHER TREMONTE LLP

July 15, 2021

BY ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

**Re: *Skatteforvaltningen v. Burns*
 No. 1:18-md-02865 (LAK)**

Dear Judge Kaplan:

This firm represents Alexander Burns. Pursuant to Section 23.6 of the ECF Rules and Instructions, we write to respectfully explain our delay in filing the attached Stipulation and Proposed Order Extending Time to Answer the Amended Complaint.

As noted in the Stipulation, the deadline to file an answer to plaintiff Skatteforvaltningen's Amended Complaint was yesterday, July 14, 2021. We attempted to file this Stipulation at 6:30pm yesterday but found that the ECF system was down. We attempted several times to access the system between 6:30pm and 11:30pm, but the system remained inaccessible. Now that access to ECF has been restored, we are filing the Stipulation and this letter explaining our delay in filing.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Michael Tremonte
Michael Tremonte

CC: All Counsel by ECF